

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CHICAGO ORNAMENTAL IRON, INC., et al.	)	
	)	
Plaintiff,	)	Case No. 1:25-cv-05131
v.	)	
	)	District Judge: Hon. Mary M.
SELECTIVE INSURANCE CO. OF	)	Rowland
AMERICA, et al.	)	
	)	Magistrate Judge: Hon. Young B.
Defendants.	)	Kim

**JOINT MOTION TO EXTEND DISCOVERY SCHEDULE**

The parties, plaintiffs Chicago Ornamental Iron, Inc., 4340 W. 47th St. LLC, and 4340 Holdings LLC (collectively, “plaintiffs”) and defendants Selective Insurance Company of America (“Selective”) and AssuredPartners of Illinois, LLC (“AssuredPartners”), jointly move to extend the discovery schedule entered by the Court on June 4, 2025. (ECF No. 21.)

1. Plaintiffs filed this four-count action on April 3, 2025, in the Circuit Court of Cook County, Illinois. The action arises from the roof collapse of plaintiffs’ building following a heavy rainstorm and their resulting claim for insurance coverage. Plaintiffs allege that the total loss exceeded \$20 million. Plaintiffs assert claims against Selective, the defendant insurer, for breach of contract (Count I), violation of the Illinois Insurance Code (Count II), and violation of the Illinois Consumer Fraud Act (Count III). Plaintiffs assert a claim against AssuredPartners, the defendant insurance broker, for professional negligence (Count IV).

2. On May 8, 2025, AssuredPartners removed the action to this Court based on diversity jurisdiction. (ECF No. 1.)

3. Both defendants answered plaintiffs’ complaint and asserted affirmative defenses. (ECF Nos. 4, 16.)

4. The parties have been at issue on the pleadings since May 22, 2025.

5. On June 4, 2025, the Court adopted the parties' proposed discovery schedule as follows:

- (a) June 10, 2025, for Rule 26 disclosures;
- (b) July 16, 2025, for issuance of written discovery;
- (c) September 26, 2025, for completion of written discovery;
- (d) December 12, 2025, for completion fact witness and oral discovery;
- (e) January 30, 2026, for plaintiffs' expert disclosures and reports;
- (f) February 27, 2026, for defendants' expert disclosures and reports;
- (g) April 15, 2026, for depositions of plaintiffs' experts; and
- (h) May 29, 2026, for depositions of defendants' experts.

6. The parties have exchanged written discovery and served responses, including document productions.

7. Open issues remain with regard to discovery responses and production that the parties are cooperatively working through, but which will not be completed by September 26, 2025, the pending date for completion of written discovery.

8. Accordingly, the parties jointly request that the date for completion for written discovery be extended 35 days to Monday, October 31, 2025, within which to complete written discovery, and that the remaining discovery schedule be extended in accordance therewith as follows:

- (a) October 31, 2025, for completion of written discovery;
- (b) January 16, 2026, for completion of fact witness and oral discovery;
- (c) March 6, 2026, for plaintiffs' expert disclosures and reports;

- (d) April 3, 2026, for defendants' expert disclosures and reports;
- (e) May 20, 2026, for depositions of plaintiffs' experts; and
- (f) June 24, 2026, for depositions of defendants' experts.

9. This is the parties' first request to extend the discovery schedule.

Wherefore, plaintiffs Chicago Ornamental Iron, Inc., 4340 W. 47th St. LLC, and 4340 Holdings LLC, defendant Selective Insurance Company of America, and defendant AssuredPartners of Illinois, LLC, respectfully request that this Honorable Court extend the pending discovery schedule by 35 days, as reflected herein.

Respectfully submitted,

By: /s/ Richard M. Goldwasser  
One of the Attorneys for Plaintiffs

Richard M. Goldwasser  
[richard.goldwasser@sfbbg.com](mailto:richard.goldwasser@sfbbg.com)  
Andrew S. Johnson  
[andrew.johnson@sfbbg.com](mailto:andrew.johnson@sfbbg.com)  
**SCHOENBERG FINKEL BEEDERMAN**  
**BELL GLAZER LLC**  
300 South Wacker, Dr. Suite 1500  
Chicago, Illinois 60606  
(312) 648-2300  
*Attorneys for Chicago Ornamental Iron, Inc.,  
4340 W. 47th St. LLC, and 4340 Holdings, LLC*

By: /s/ Michael P. Baniak

Michael P. Baniak  
Dennis M. Dolan  
Zachary G. Stillman  
LITCHFIELD, CAVO, LLP  
303 West Madison, Suite 300  
Chicago, IL 60606  
[Baniak@litchfieldcavo.com](mailto:Baniak@litchfieldcavo.com)  
[Dolan@litchfieldcavo.com](mailto:Dolan@litchfieldcavo.com)  
[Stillman@litchfieldcavo.com](mailto:Stillman@litchfieldcavo.com)  
*Attorneys for Defendant*  
*Selective Insurance Company of America*

By: /s/ Carrie E. Josserand

LATHROP GPM LLP  
Arielle B. McPherson  
155 North Wacker Drive, Suite 3800  
Chicago, IL 60606  
[arielle.mcpherson@lathropgpm.com](mailto:arielle.mcpherson@lathropgpm.com)  
Michael J. Abrams (admitted pro hac vice)  
Carrie E. Josserand (admitted pro hac vice)  
2345 Grand Blvd., Ste. 2200  
Kansas City, MO 64108  
[Michael.abrams@lathropgpm.com](mailto:Michael.abrams@lathropgpm.com)  
[Carrie.josserand@lathropgpm.com](mailto:Carrie.josserand@lathropgpm.com)  
*Attorneys for Defendant*  
*AssuredPartners of Illinois, LLC*